

IN THE CIRCUIT COURT OF WARREN COUNTY, MISSISSIPPI

ROOSEVELT HARRIS

PLAINTIFF

VS.

NO. 17,104-CI

MURPHY OIL USA, INC.

DEFENDANT

SUMMONS

STATE OF MISSISSIPPI

TO: C.T. Corporation System  
645 Lakeland East Drive  
Ste. 101  
Flowood, MS 39232

NOTICE TO THE DEFENDANT

THE COMPLAINT AND DISCOVERY WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS.

You are required to mail or hand-deliver a copy of a written response to the following Attorney for the Plaintiff:

MARSHALL SANDERS  
ATTORNEY AT LAW  
1115 MONROE STREET  
P.O. BOX 67  
VICKSBURG, MS 39183-2951  
(601) 636-0846

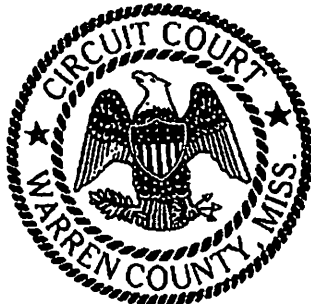
Your response must be mailed or hand-delivered within thirty (30) days from the date of delivery of this Summons and Complaint and Discovery or a judgment of default will be entered against you for the money or other things demanded in the Complaint.

You must also file the original of your response with the Clerk of this Court within a reasonable time afterwards.

Issued under my hand and seal of this Court this the 14<sup>th</sup> day of December, 2017.

JAN HYLAND DAIGRE, CIRCUIT CLERK  
WARREN COUNTY, MISSISSIPPI

BY: Dana Kenney D.C.



IN THE CIRCUIT COURT OF WARREN COUNTY, MISSISSIPPI

ROOSEVELT HARRIS

PLAINTIFF

VS.

NO. 17,104-CJ

MURPHY OIL USA, INC.

DEFENDANT

COMPLAINT

COMES NOW, the Plaintiff, Roosevelt Harris, by and through his Attorney, Marshall Sanders, in this his Complaint against the Defendant, Murphy Oil, USA, Inc., and would show unto the Court the following, to-wit:

1. That the Plaintiff, Roosevelt Harris (hereinafter referred to as Plaintiff), is an adult resident citizen of Vicksburg, Warren County, Mississippi.

2. That the Defendant, Murphy Oil USA, Inc. (hereinafter referred to as Defendant), is a Delaware Corporation doing business in the State of Mississippi whose agent for service of process is C.T. Corporation System, 645 Lakeland East Drive, Ste 101, Flowood, Mississippi 39232

3. That on the 7<sup>th</sup> day of September, 2014 Plaintiff slipped and fell on floor at a store in Vicksburg, Mississippi owned by the Defendant thereby causing him bodily injury; that Defendant negligently kept its premises in an unsafe condition and that as a proximate result of Defendant's negligence, Plaintiff incurred serious bodily injury.

4. Furthermore, as a proximate result of the negligence of the Defendant, Plaintiff has suffered damages in medical bills, pain and suffering, and temporary and permanent disability.

WHEREFORE PREMISES CONSIDERED, Plaintiff asks for judgment against the Defendant in actual damages and punitive damages, in an amount which reasonably compensates him for all damages incurred.

**FILED**

SEP 05 2017

JAN HYLAND DAIGRE, CIRCUIT CLERK

BY JB D.C.

**RESPECTFULLY SUBMITTED,**

**ROOSEVELT HARRIS**

**BY:**

  
**MARSHALL SANDERS, ATTORNEY  
FOR THE PLAINTIFF**

**MARSHALL SANDERS  
ATTORNEY AT LAW  
MSB #6444  
1115 MONROE STREET  
P.O. BOX 67  
VICKSBURG, MS 39180  
601-636-0846**

**IN THE CIRCUIT COURT OF WARREN COUNTY, MISSISSIPPI**

**ROOSEVELT HARRIS**

**PLAINTIFF**

**VS.**

**NO. 17,0104-CI**

**MURPHY OIL, USA, INC.**

**DEFENDANT**

**PLAINTIFF'S FIRST SET OF INTERROGATORIES**  
**AND PRODUCTION OF DOCUMENTS**  
**TO THE DEFENDANT**

**COMES NOW**, the Plaintiff, Roosevelt Harris, in this their First Set Of Interrogatories To The Defendant, and ask that they be answered according to law:

**INTERROGATORY NO. 1:** Please state the full name, address, and occupation/job title of the person completing this discovery for the Defendant.

**INTERROGATORY NO. 2:** State the name, address and telephone number of the owner of the store in question.

**INTERROGATORY NO. 3:** State the name and address of any potential party to this lawsuit not already a party.

**INTERROGATORY NO. 4:** State the name, address, and qualifications of each expert whom you expect to call as an expert witness at a trial of this case, and the subject matter concerning which the expert expects to testify, also, attach a copy of any report, including factual observations and opinions, that have been prepared by any such expert.

**INTERROGATORY NO. 5:** Please state whether you have a copy of any statement that the Defendant has previously made concerning the action of or its subject matter and that is in your possession, custody or control.

For the purpose of this question, a statement previously made is (1) a written statement signed or otherwise adopted or approved by the person making it, or (2) a stenographic,

mechanical, electrical, or other recording, or a transcription that is a substantially verbatim recital of an oral statement by the person making it and contemporaneously recorded.

**INTERROGATORY NO. 6:** Please state whether there exist and describe the contents of any insurance agreement under which any person carrying on an insurance business may be liable to satisfy part or all of a judgment which may be entered in this action or to indemnify or reimburse you for payment made to satisfy the judgment, pursuant to Rule 26 (b) (2), including but not limited to any policy issued as of the time of the incident in question herein.

**INTERROGATORY NO. 7:** Describe in your own words how the incident occurred and state specifically and in detail what the claim or contention of the Defendant will be regarding any cause or contributing cause of the incident, including a statement in detail of the facts or information upon which this contention is based.

**INTERROGATORY NO. 8:** Describe in detail any conversations you have had with the Plaintiff or Plaintiff's representative following the incident in question.

**INTERROGATORY NO. 9:** Please state whether any liability insurance carrier identified by you herein has given you notice of any denial or reservation of your right to coverage for this case.

**INTERROGATORY NO. 10:** Please state whether you are the owner of the store made the basis of this lawsuit. If not, please state the name, address and telephone number of said owner.

**INTERROGATORY NO. 11:** Please state the name, address and telephone number of each person known to you or to your attorney who has knowledge concerning the incident which is the subject of this action, or any negligence of the Plaintiff.

**INTERROGATORY NO. 12:** Please state the name, address and telephone number of each and every person who: (a) observed the occurrence of the incident in question in this cause; (b) did not observe the occurrence of the incident but came upon the scene after it had occurred; and (c) otherwise has knowledge of discoverable matter regarding the occurrence of the incident.

**INTERROGATORY NO. 13:** Please state the names and addresses of all of your employers, including self-employment, beginning with the year 2014 up to and including the date of the filing of the answers to these Interrogatories, with the approximate starting and termination dates of each such employment, the title and general nature of your duties in each such employment, and the name of your immediate supervisor, if any.

**INTERROGATORY NO. 14:** Please identify all photographs, video cameras or other documents concerning the events and happenings made the basis of this lawsuit, the area of the occurrence made the basis of this lawsuit, persons or objects involved, either made before, at the time since the incident made the basis of this lawsuit, that you, your attorney, your insurance carrier or anyone acting on your behalf or their behalf, have or know of.

**RESPECTFULLY SUBMITTED,**

**ROOSEVELT HARRIS**

**BY:**

  
**MARSHALL SANDERS**  
**ATTORNEY FOR PLAINTIFF**

**MARSHALL SANDERS**  
**Attorney at Law**  
**MSB #6444**  
**1115 Monroe Street**  
**P.O. Box 67**  
**Vicksburg, MS 39183-295**  
**Telephone: 601-636-0846**  
**Telcfax: 601-636-2754**  
**Email: marshallsanders29@gmail.com**

IN THE CIRCUIT COURT OF WARREN COUNTY, MISSISSIPPI

ROOSEVELT HARRIS

PLAINTIFF

VS.

NO. 17,0104-CJ

MURPHY OIL, USA, INC.

DEFENDANT

**PLAINTIFF'S FIRST REQUEST FOR  
PRODUCTION OF DOCUMENTS  
TO DEFENDANT**

COMES NOW, the Plaintiff, Roosevelt Harris in this his First Request For Production of Documents To Defendant and asks that the following documents be produced according to law:

**REQUEST NO. 1:** Any and all photographs and video tapes that Defendant has of the incident in question

**REQUEST NO. 2:** Any and all expert reports which have been obtained from any expert who is expected to testify and if a report has not been prepared, the preparation of a report is hereby requested.

**REQUEST NO. 3:** A copy of any and all insurance agreements under which any person carrying on an insurance business may be liable to satisfy part or all of a judgment which may be entered in this action or to indemnify or reimburse you for payments made to satisfy the judgment, pursuant to Rule 26 (b) (2), including but not limited to any policy issued to the Defendant which provided liability coverage of the store in question as of the time of the incident in herein.

**REQUEST NO. 4:** Copies of any and all statements previously made by Defendant concerning the subject matter of this lawsuit, including any written statement signed or otherwise adopted or approved by the Defendant hereto and any stenographic, mechanical,

electrical or other type of recording or any transcription thereof made by Defendant hereto and contemporaneously recorded.

**REQUEST NO. 5:** Any and all drawings or sketches of the scene of the incident which has been made the basis of this lawsuit.

**REQUEST NO. 6:** Any and all settlement agreements, wherein you have arrived at a settlement or agreement between you and any other person, whether or not a party to this lawsuit, regarding or pertaining to the incident made the basis of this lawsuit or any damages resulting therefrom.

**REQUEST NO. 7:** A copy of any surveillance movies or photographs which have been made of the Plaintiff.

**REQUEST NO. 8:** Any and all photographs that Defendant has of the area involved in the incident in question.

**REQUEST NO. 9:** Copies of any witness statements that are relevant to the incident in question that are not privileged by law.

**RESPECTFULLY SUBMITTED,**

**ROOSEVELT HARRIS**

BY: 

**MARSHALL SANDERS, ATTORNEY  
FOR THE PLAINTIFF**

**MARSHALL SANDERS  
ATTORNEY AT LAW  
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